



**THE CONDUCT OF
ARCHAEOLOGICAL WORK & HISTORIC
BUILDING RECORDING
WITHIN EXMOOR NATIONAL PARK**

A guide for developers and their archaeological contractors, historic buildings advisors, architects and consultants and all involved in the planning process

(This document forms Annex 1 of the National Park Local Plan)

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A1.1 This document sets out standards and guidance for archaeological work and historic building recording in Exmoor National Park undertaken as part of the planning process. It will ensure that all work of this kind within Exmoor National Park is carried out in a professional manner and to a high standard.

Introduction

A1.2 This document is aimed at developers and their archaeological contractors, historic buildings advisors and consultants and all involved in the planning process.

A1.3 It sets out the standard for the agreed programme of work undertaken through the planning process. Projects initiated through the planning process should conform to the highest professional standards.

A1.4 Planning and Policy Guidance 16 (PPG16) states that archaeology is a material consideration in the determination of planning applications (paragraphs 2.102-2.116 of the Exmoor National Park Local Plan (First Alteration), sets out the importance of Exmoor's archaeology, and policies LNC15 and 16 reflect the significance of archaeological remains and seek to protect them).

A1.5 The purposes of the National Park as set out in Section 61 of the Environment Act 1995 are: 'to conserve and enhance the natural beauty, wildlife and *cultural heritage* of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities by the public'.

A1.6 This document sets out the practical process of achieving the full potential of recording and preserving the National Park's archaeological heritage. Also within the scope of this document is the archaeological recording of historic buildings.

Underlying Principles

A1.7 The professional body for field archaeologists is the Institute of Field Archaeologists whose members are bound to adhere to a Code of Conduct (IFA 1994). It is preferable that projects are managed by a Member of the IFA. However, the suitability of the manager will be judged on his/her past record, by the National Park Authority. The project manager will be expected to ensure that all project staff and sub-contractors are suitably qualified and experienced. The IFA's Code of Conduct contains four underlying principles and all those involved should remember these four statements:

- The archaeologist shall adhere to the highest standards of ethical and responsible behaviour in the conduct of archaeological affairs.

- The archaeologist has responsibility for the conservation of the archaeological heritage.
- The archaeologist shall conduct his or her work in such a way that reliable information about the past may be acquired, and shall ensure that the results be properly recorded.
- The archaeologist has responsibility for making available the results of archaeological work with reasonable dispatch.

The Planning Process - Before a Planning Application is Submitted

A1.8 The National Park Authority welcomes informal discussion at pre-consultation stage. Applicants are advised to discuss the archaeological implications in advance of submitting a planning application or General Permitted Development Order (GPDO) consultation. Mitigation strategies and assessment and evaluation techniques are best addressed early in the consultation process.

Assessment and Evaluation

A1.9 When a planning application is assessed by the National Park Authority there may be insufficient information available to make a reasoned decision concerning the likely effect of the proposal on archaeological remains or historic buildings. Under Policies LNC15 or LNC16 an archaeological assessment and evaluation may be required before the application is determined. The assessment and evaluation process should be agreed in writing with the National Park Authority. It may involve either or both of the following processes:

A1.10 *Desk Top Assessment* - an assessment of the known or potential archaeological resource within a specified area or site on land or underwater. It consists of a collation of existing written and graphic information in order to identify the likely character, extent, quality and worth of the known or potential archaeological resource in a local, regional, national or international context as appropriate.

A1.11 *Evaluation* - a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area or site on land or underwater. It may include trial-trenching, geophysical survey, environmental sampling and building recording.

Assessment and Evaluation Report

A1.12 The results of the assessment and evaluation stage should be presented as a written report to the National Park Authority. The report should define the location, extent and significance of archaeological remains, and illustrate how these may be affected by the proposals. It may be advisable to discuss the contents of the report with the National Park Authority at draft stage.

The Planning Process – After Planning Permission is Granted Planning Conditions

A1.13 A planning application may be approved with archaeological conditions. The archaeological condition may overcome archaeological considerations that would otherwise have led to the application being refused. Generally archaeological work carried

out through the planning process is the result of a condition requiring the applicant to gain agreement in writing from the National Park Authority before development begins. The condition is not fulfilled until the applicant has completed the required work and has deposited a completed archaeological report with the National Park Authority and the relevant County Council Archaeological Service, and the completed archive with the appropriate museum or other agency.

The Specification

A1.14 In the majority of cases the National Park Authority will require that the contractor produces a specification of archaeological works or historic building recording to be agreed in writing by the National Park Authority in advance. The specification should set out the basic requirements of the project and the standards which are to be adhered to.

A1.15 The specification will be expected to:

- contain a reasoned discussion of the field and analytical techniques selected.
- give details of techniques, artefact collection policies, discard policies, environmental sampling strategy and recording techniques.
- explain the reasons for the rejection of a particular technique.
- outline the proposed reporting procedure and the likely timetable, as well as the anticipated content of the final and any other reports.
- include an indication of the level and format of the archive to be produced.
- give a timetable for obtaining the necessary consents, its preparation and deposition.
- how the results of the project should be reported and published.

A1.16 In addition to normal contingency provisions, the National Park Authority requires a compulsory archaeological science contingency (ASC) to be included in most projects. This will normally be 15% of the total tender, but the National Park Authority may vary this rate in response to the specific potential of the project.

A1.17 The points of reference for the production of the specification should be based on the advice in PPG15 & PPG16, RCHME guidance, Museums and Galleries Commission and Society of Museum Archaeologists guidelines as well as further guidance available from the Institute of Field Archaeologists (IFA). (see section 6).

Historic Building Recording

A1.18 Archaeological building investigation and recording is a formal programme of work intended to establish the character, history, date, form and archaeological development of a structure. It may be required as part of an archaeological evaluation (prior to a planning application) to help in the determination of that application, or as part of an archaeological condition in order to record aspects of a building before development takes place. Such recording should result in the production of measured drawings, an ordered archive and report. The level and extent of recording will be covered within the agreed specification.

Groundworks

A1.19 A planning condition will either require a watching brief or a programme of excavations (where the archaeological information is preserved by record) agreed in advance.

Watching brief

A1.20 A watching brief is a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons within a specified area or site on land or underwater, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme will result in the preparation of a report and ordered archive. One of four levels of watching brief will be stipulated:

- (i) A comprehensive watching brief - where archaeologists are present at all times during the groundwork operations.
- (ii) An intensive watching brief – where archaeologists are on site during the undertaking of sensitive groundwork operations.
- (iii) An intermittent watching brief – where archaeologists are on site to observe the groundworks after digging operations have been completed, but before construction work commences.
- (iv) A partial watching brief – where observation takes place only when considered appropriate.

Excavation (preservation by record)

A1.21 Archaeological excavation – a programme of controlled, intrusive fieldwork with defined research objectives which examines and records archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site (on land or underwater). The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project and in the light of findings.

Report Submission

A1.22 The specification should define the form and content of the report. The report must be submitted to and accepted by the National Park Authority before the planning condition is fulfilled. A copy should also be deposited with the relevant County Council Archaeological Service. There are four broad categories of publication, of which category 1 will always be required:

1. Evaluation and assessment for submission in support of a planning application or as part of an archaeological condition attached to a planning permission. It should be written to address the requirements of the client and the planning authorities.
2. Brief academic report. A notification of the work to the archaeological community.
3. Full academic publication to analyse and synthesise the full implications of the fieldwork. It should be addressed to the specialist archaeological community.
4. Popular publication to share the results of the fieldwork with the public.

A1.23 The appropriate level of publication should be set out in the specification. However, archaeological discoveries may warrant a different level of publication from that initially chosen and the final form of publication should be agreed with the National Park Authority. Three copies of the category 1 report should be submitted within six months of the completion of fieldwork or, in the case of an evaluation or assessment, with the planning application.

Treatment of Environmental Evidence, Archaeological Materials and Archiving

Environmental Evidence

A1.24 Environmental evidence is a necessary and important element of the archaeological record. During a field evaluation an accurate assessment of the preservation of environmental evidence including animal bone, shell, waterlogged and charred organic remains, and the condition of any buried soils and sediments should be made. This assessment should be sufficiently comprehensive to allow an evaluation of its potential archaeological relevance and to enable the construction of a structured sampling strategy and post-excavation programme, should further archaeological work be required. When undertaking this work advice must be sought from an appropriate environmental consultant or from the English Heritage Regional Advisor for Archaeological Science. The appropriate specialists should be available or on-site to advise on environmental issues. If a mitigation strategy is to be developed the feasibility of long-term preservation upon the environmental content of the site must be considered.

Treatment of Archaeological Materials

A1.25 Exmoor National Park Authority requires a minimum standard for the handling of artefactual material retrieved from archaeological interventions. All staff, including all sub-contracted specialists involved with a project, must be made aware of *First Aid for Finds*, Society of Museum Archaeologists guidelines, the Museums and Galleries Commission's Standards of Collection Care and other related documents, and should follow the procedures listed in them. Of particular value to those managing archaeological archives both on-site and in long-term storage are recent publications from English Heritage. It is imperative that the implications of these documents are noted at the tendering stage, because they may have both practical and financial implications. In particular the advice of museum conservation staff will be of value when handling sensitive materials.

Archiving System

A1.26 Before the commencement of fieldwork it is essential that provision is made for long term storage of the subsequent archive. It is essential that archaeological material be deposited in a museum which has expertise and resources to provide adequately for long-term conservation and reference. If this is not to be the case the National Park Authority and the receiving Museum will expect to be assured that these standards of care and access will be met.

Additional Considerations

Publicity

A1.27 Exmoor National Park Authority encourages a positive approach to involving the local community and other interested parties in archaeological projects. Where possible active participation in the form of open days or school visits should be considered. In cases where projects produce locally interesting information a press release should be considered. Contracting/Consultant units should of course obtain permission from the site owners prior to involving the public or media. Where appropriate, further publication of 'summary' reports should be considered for a wider public audience in the form of leaflets or booklets.

Legal and ethical considerations

A1.28 Legal and ethical factors must be considered when undertaking archaeological fieldwork. These relate particularly to human remains and to Treasure (Treasure Act 1997 and associated Code of Practice), and the following gives guidance on handling these situations.

- Archaeological contractors will be expected to act in accordance with the wishes of the site owner/agent and local residents. They should follow access and office procedures on development sites as well as behaving appropriately as far as noise and other factors are concerned.
- All unexpected human remains encountered must be left *in situ* and suitably protected from deterioration. All finds should be reported to the Police and the Coroner's Office. If removal is necessary and unavoidable it must be carried out in compliance with the statutory provisions of the Burial Act 1857 and subsequent legislation and after obtaining a Section 25 licence for exhumation from the Home Office. The excavator must comply with the conditions of the licence as well as other Home Office and environmental health regulations. All reasonable requests as to the method of removal, re-interment or disposal of the remains and/or associated items should be complied with. The simplest way to safeguard remains that are not to be excavated is by sensitive back-filling as soon as possible.
- Adherence to the Museum Association's Code of Ethics is expected in relation to the management of the archive and associated information.
- Finds from the foreshore are subject to the requirements of the Merchant Shipping Act 1995.
- Finds of Treasure (as defined) must be archaeologically recorded and removed to a safe place and reported to the local Coroner within 28 days in accordance with the procedures of the Treasure Act and Code of Practice. If removal of such finds is not possible on the same day then adequate security arrangements must be made. This also applies to other intrinsically valuable objects which may subsequently not be subject to a Treasure Trove enquiry.

Notification

A1.29 In order for effective monitoring of archaeological projects, Exmoor National Park Authority and the recipient museum should be notified prior to the commencement of work. The letter should contain basic information including:

- site name and address
- planning application number (if relevant)
- start date of work (if known)
- name of project officer
- specialists being used

To avoid repetition it is expected that contracting units submit a list of project officers/managers and specialists to the National Park Authority. A presumption will be made that the named individuals will be responsible in each project. If a specialist is changed the National Park Authority should be notified in writing, and agreement sought prior to change.

Health and safety

A1.30 The health and safety of all those involved in every archaeological project is paramount. Archaeologists are expected to operate in accordance with current health and safety legislation and industry regulations. At all times health and safety must take priority over archaeological matters.

Insurance

A1.31 The IFA recommends that an archaeological contractor or other organisation undertaking field projects “must ensure they are covered by adequate insurance policies, public liability and employer’s liability, some relevant form of civil liability indemnity or professional indemnity” (IFA, 1994b-d). It is also possible for developers to insure against the consequences of an unexpected discovery, eg a find requiring expensive conservation, provided sufficient evaluation has been previously undertaken.

Sources of information

DOE (1990) Planning Policy Guidance Note 16, Archaeology and Planning

DOE (1994) Planning Policy Guidance Note 15, Planning and the Historic Environment

English Heritage (1995) *Geophysical survey in Archaeological Field Evaluation*

Institute of Field Archaeologists (1994) *Code of Conduct*

Institute of Field Archaeologists (1999) *Standard and guidance for an archaeological watching brief; Standard and guidance for archaeological excavation; Standards and guidelines for finds work* (IFA blue policy folder, standards and guidance)

Museums and Galleries Commission (1992), *Standards in the Museum Care of Archaeological Collections*

RCHME (1996) *Recording Historic Buildings: A descriptive specification* (third edition)

Society of Museum Archaeologists (1993) *Selection, retention and dispersal of archaeological collections. Guidelines for use in England, Northern Ireland, Scotland and Wales*

Watkinson D and Neal V (1998) *First Aid for Finds*

6 **This document**

This document is derived from Somerset County Council's *Archaeological Manual* (currently in draft form).

Table 2.3

THE HISTORIC ENVIRONMENT AND THE PLANNING PROCESS

